From: Rochlin, Kevin

Sent: Thursday, March 06, 2014 3:32 PM

To: 'Susan Hanson'

Cc: rick poeton (rtpoeton@msn.com); Douglas.Tanner@deq.idaho.gov; Greutert, Ed [USA]; Kelly

Wright; Scott Miller - Idaho DEQ (Scott.Miller@deq.idaho.gov); Stifelman, Marc; susanh@ida.net;

Zavala, Bernie

Subject: RE: FMC Team Conference Call

Follow Up Flag: Follow up Flag Status: Flagged

Not sure where were in the discussion when you had to drop off the call. Rick and I talked again after the call. Here is EPA's current thinking.

- 1) At the end of the project, FMC needs to demonstrate compliance with the performance standard in the IRODA.
- 2) Prior to remedy implementation, FMC will need to have a demonstrated an approved methodology for measuring compliance. I do not want to be in the position of FMC having placed the cap, and the cap not meeting the performance standard.
- 3) FMC will need to submit a new proposal for their performance test. Once that is approved, they will need to submit a revised work plan.

Regarding how to measure gamma:

- 1) Because there is interference from gamma shine, a shielded instrument (PIC) will be needed.
- 2) The PIC will need to be correlated to field gamma measurements.
- 3) EPA suggested that one way would be to calibrate to soil radium concentrations. The action level measured by the PIC, correlates to the soil gamma measurement which equates to the required gamma level (I can this if needed, but it will take more time than I have for this email.)
- 4) FMC proposed rebuilding a test pad in the western undisturbed area, and taking measurements with PIC and unshielded instrument as they add cover to the test pad.
- 5) EPA's concern for any method is to show that the precision and accuracy of the measurements allow for a statistically valid determination of the action level.
- 6) FMC will need to demonstrate that their method is statistically valid.

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From:

Kevin Rochlin | Superfund Remedial Project Manager U.S. Environmental Protection Agency | Region 10 Office of Environmental Cleanup
1200 6th Avenue, Suite 900, ELC-111 | Seattle, WA 98101
(206) 553-2106
(206) 553-0124 (fax)
rochlin.kevin@epa.gov

----Original Message-----

From: Susan Hanson [mailto:susanh@ida.net] Sent: Thursday, March 06, 2014 11:24 AM

To: Rochlin, Kevin Cc: Kelly Wright

Subject: Re: FMC Team Conference Call

Kevin,

From the discussions back and forth on the call it sounded like EPA may be changing the way FMC monitors to show they are achieving the performance standards set forth in the IROD. I had to drop off but that was my take... a lot of back and forth on the PIC vs sodium iodide- trying for correlations when one measure from the top down and one measures multiple sources. Measuring radium 226 concentrations vs. exposure rates through gamma. I'd like to talk with you when Kelly gets back to zero

in on EPA's position, if it is different from the current work plan.

If FMC is going to be moving 1million tons of slag- the concentrations may vary with depths. Hopefully that will be accounted for and measured as they move to different levels in the slag pile.

Susan

On Mar 6, 2014, at 10:11 AM, "Rochlin, Kevin" < rochlin.kevin@epa.gov> wrote: > 866-299 3188 > Code 206 553 2139 > From: > Kevin Rochlin | Superfund Remedial Project Manager U.S. Environmental > Protection Agency | Region 10 Office of Environmental Cleanup > 1200 6th Avenue, Suite 900, ELC-111 | Seattle, WA 98101 > (206) 553-2106 > (206) 553-0124 (fax) > rochlin.kevin@epa.gov > -----Original Message-----> From: Susan Hanson [mailto:susanh@ida.net] > Sent: Thursday, March 06, 2014 9:07 AM > To: Rochlin, Kevin > Cc: Kelly Wright > Subject: Re: FMC Team Conference Call > No ones on call > Susan Hanson > On Mar 5, 2014, at 10:14 AM, "Rochlin, Kevin" < rochlin.kevin@epa.gov> wrote: > >> yes >> From: Susan Hanson [susanh@ida.net] >> Sent: Wednesday, March 05, 2014 6:55 AM >> To: Rochlin, Kevin >> Subject: Fwd: FMC Team Conference Call >> Is the FMC call march 6? >> >> Susan Hanson >> Begin forwarded message: >> From: "Rochlin, Kevin" >> <rochlin.kevin@epa.gov<mailto:rochlin.kevin@epa.gov>> >> Date: February 24, 2014, 11:16:13 AM MST >> "Douglas.Tanner@deq.idaho.gov<mailto:Douglas.Tanner@deq.idaho.gov>" >> < Douglas. Tanner@deq.idaho.gov < mailto: Douglas. Tanner@deq.idaho.gov >>, >> "Greutert, Ed [USA]" >> <greutert ed@bah.com<mailto:greutert ed@bah.com>>, Kelly Wright

>> <kwright@sbtribes.com<mailto:kwright@sbtribes.com>>, "Scott Miller -

>> Idaho DEQ

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